

SEP 20 2001

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED

SEP 20 AM 11:52
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

AMY YOUNG,
450 K Salem Drive
Vermillion, Ohio 44089,

Appellant,

v.

HALLIBURTON, INC.
AGENT FOR SERVICE
Kellogg, Brown & Root, Inc.
4100 Clinton Drive
Houston TX 77020

Appellee.

Case No. **1:01CV2225**

Judge

JUDGE NUGENT

Magistrate Judge

MAG. JUDGE PERELMAN

Arbitration Case No. 70 480 00296 00

Previous Case No. C2-01-848

COMPLAINT

(Jury Demand Endorsed Hereon)

JURISDICTION

1. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332 because the amount in controversy is in excess of \$75,000 and is between citizens of different states.
2. Venue is proper in this Court because Appellant Amy Young (hereinafter "Appellant") resides in the Northern District of Ohio, Eastern Division and a substantial part of the events or omissions giving rise to this action occurred in this judicial district.

FACTS COMMON TO ALL COUNTS

3. Appellant hereby reincorporates and realleges paragraphs 1 through 2.

4. On July 17, 2000 Appellant filed a claim through Appellee's Dispute Resolution Program concerning matters regarding her employment with Appellee.
Appellant's arbitration matter was designated Case No. 70 480 00296 00.
5. On August 8, 2001 Appellant received arbitrator Carl F. Muller's Decision and Award.
6. On September 6, 2001 Appellant filed a notice of appeal in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. C2-01-848.
7. Shortly thereafter on September 10, 2001, Appellant realized that the Northern District of Ohio, Eastern division was the proper venue for this matter.
Resultantly, Appellant voluntarily dismissed her action without prejudice and re-filed the instant Complaint.

COUNT I – The Arbitrator's Decision was Arbitrary and Capricious

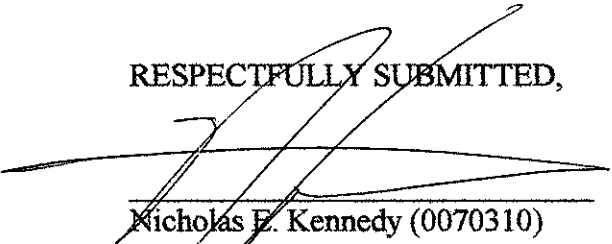
8. Appellant hereby reincorporates and realleges paragraphs 1 through 7.
9. Appellant hereby appeals to this Court from the Arbitration Decision rendered by Carl F. Muller, as the decision was arbitrary and capricious. A copy of the decision is attached hereto.

WHEREFORE, Appellant, Amy Young, respectfully requests that this Court order the following judgment against Defendants:

1. Compensatory damages of \$150,000;
2. Non-economic damages of \$100,000;
3. Punitive damages of \$300,000

4. Plaintiff's costs, both prejudgment and post-judgment, attorney's fees, injunctive relief, and all other relief that this Court may deem just and equitable.

RESPECTFULLY SUBMITTED,

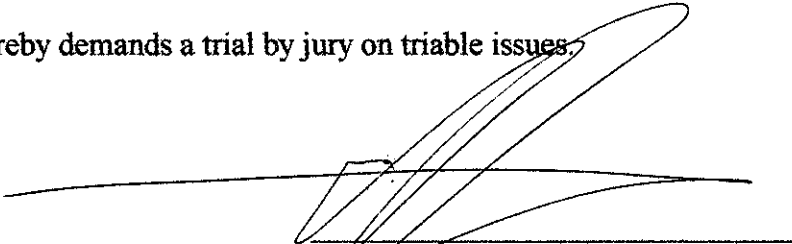


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OF COUNSEL:
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JURY DEMAND

Appellant Young hereby demands a trial by jury on triable issues.



Nicholas E. Kennedy (0070310)
Trial Attorney for Appellant Young